



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Raleigh Field Office
Post Office Box 33726
Raleigh, North Carolina 27636-3726

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Gregory J. Thorpe, Ph.D.
North Carolina Department of Transportation
Project Development and Environmental Analysis
1548 Mail Service Center
Raleigh, North Carolina 27699-1548

Dear Dr. Thorpe:

This letter is in response to your request for comments from the U.S. Fish and Wildlife Service (Service) on the potential environmental effects of the proposed widening of US 13 from US 158 near Winton to US 158 in Tarheel, Hertford and Gates Counties, North Carolina (TIP No. R-2507A). These comments provide scoping information in accordance with provisions of the Fish and Wildlife Coordination Act (16 U.S.C. 661-667d) and section 7 of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531-1543).

Extensive forested wetlands exist along the existing US 13. Based on a January 4, 2006 field inspection by Service biologist Gary Jordan, it appears that some of the road widening could be accommodated by previously cleared right-of-way. However, substantial linear wetland impacts are still likely. Because of the value of the swamp forest to wildlife species, the Service is very concerned with the potential impacts. It appears that some of these impacts would occur within the Chowan Swamp Game Land. If these impacts are unavoidable, the Service recommends that compensatory mitigation options adjacent to the Chowan Swamp Game Land be explored. Strong consideration should be given to obtaining mitigation sites that could be transferred to the Game Land for protection and management in perpetuity.

Another consideration regarding the Chowan Swamp is the significant number of black bears (*Ursus americanus*) in the area. Widening US 13 to four lanes and potentially increasing the posted speed could lead to greater black bear mortality via road kill and increased direct, indirect and cumulative effects to bear habitat. Increased black bear road kill also translates to increased danger to the traveling public. The environmental analysis of the project must address the issue of black bears and means of avoiding and minimizing impacts to the species. If the environmental analysis determines (through animal collision data or through observation of black bear crossing points) that black bears are crossing the existing US 13 in significant numbers, consideration should be given to constructing large wildlife crossings. However, the flatness of the terrain and other considerations may limit the opportunity for such crossings.

In addition to impacting habitat for black bears, many other forest species will likely be affected through the direct loss of forest habitat and through increased forest fragmentation. The effects